

**REMARKS**

Applicants respectfully request reconsideration. Claims 1-36 were previously pending in this application. By this amendment, Applicants are amending claims 1, 9-14, 17-18, and 22-26. No new claims have been added. As a result, claims 1-36 are pending for examination with claims 1, 9-14, and 22-26 being independent claims. No new matter has been added.

**Rejections under 35 U.S.C. §112**

Claims 17 and 18 stand rejected under 35 U.S.C. §112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

The Office Action states that claims 17 and 18 recite the limitation "metal oxide" in line 2, and that there is insufficient antecedent basis for this limitation in the claims. As suggested by the Office Action, Applicants have amended claims 17 and 18 to both recite "the first metal oxide." As a result, claims 17 and 18 are now believed to be definite.

Accordingly, withdrawal of the rejection of these claims is respectfully requested.

**Rejections Under 35 U.S.C. §103**

Claims 1-36 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Nakamura et al. (U.S. 6,291,763) in view of Meinhardt et al. ("Optoelectronic Device made from Multilayer and Molecularly Doped Organic Layers", 01/1999).

Nakamura is directed to a photoelectric conversion device that includes an electrically conductive substrate, a photosensitive semiconductor layer, a charge transporting layer, and a counter electrode.

The Office Action contends that while Nakamura does not teach forming an intermediate film comprising PEDOT/PSS on a metal oxide layer, Meinhardt teaches a method of making an optoelectronic device wherein an ITO electrode is coated with PEDOT doped with PSS (referring to Fig. 2 of Meinhardt). The Office Action subsequently argues that it would have been obvious to

have coated the metal oxide film of Nakamura with the conducting polymer PEDOT/PSS of Meinhardt to allow for high transmission in the visible spectral region, low sheet-resistance, good thermal stability, and UV-stability.

Without acceding to the propriety of the rejections, Applicants have amended all of the independent claims 1, 9-14, and 22-26 to recite the metal film being non-porous and less than 100 nm in thickness. Applicants point out that none of the applied references teach or disclose the *metal film being non-porous and less than 100 nm*. In fact, Nakamura explicitly teaches that the electron-conducting layer (which can be made of metal) is porous and preferably has a thickness of 0.1 to 100 microns, which is greater than or equal to 100 nm (see col. 15 lines 17-18 and Fig. 2A of Nakamura). In contrast, the metal film in the current specification is not porous and the thickness is as small as 40 nm (see Examples 1 and 2). As a result, because none of the applied references disclose the metal film being non-porous and less than 100 nm in thickness, independent claims 1, 9-14, and 22-26 should now be in condition for allowance. Because claims 2-8 and 27 depend directly from independent claim 1, and claims 15-21 and 29 depend directly from independent claim 14, for at least the same reasons as stated above for claim 1, these claims should also be allowed. Similarly, because claims 28 and 30-31 depend directly from independent claims 9, 22, and 25, respectively, these claims should also be allowed.

**CONCLUSION**

A Notice of Allowance is respectfully requested. The Examiner is requested to call the undersigned at the telephone number listed below if this communication does not place the case in condition for allowance.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, the Director is hereby authorized to charge any deficiency or credit any overpayment in the fees filed, asserted to be filed or which should have been filed herewith to our Deposit Account No. 23/2825, under Docket No. S1459.70088US00.

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Respectfully submitted,

By *Randy J. Pritzker*  
Randy J. Pritzker  
Registration No.: 35,986  
WOLF, GREENFIELD & SACKS, P.C.  
Federal Reserve Plaza  
600 Atlantic Avenue  
Boston, Massachusetts 02210-2206  
617.646.8000